



# Procurement Management Procedure *OETI-PMP-10*

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Environmental Protection Agency  
Office of Enterprise Technology and Innovation (OETI)

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## Document Change History

Version	Date	Author	Description of Changes

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## 1. Introduction

This document defines the process by which staff within the Environmental Protection Agency's (EPA's) Office of Enterprise Technology and Innovation (OETI) performs procurement management for projects.

### 1.1 Purpose

This document defines the methodology, process flow, and relevant standards by which OETI project staff performs procurement management activities and identifies participants and their responsibilities.

### 1.2 Background

For the purpose of this procedure, procurement management is defined as “the processes to purchase or acquire the products, services, or results needed from outside the project team to perform the work. Procurement management also includes administering any contract issued by an outside organization (buyer) that is acquiring the project from the performing organization (the seller), and administering contractual obligations placed on the project team by the contract.”<sup>1</sup> Procurement management begins with determination that a project requirement needs to be obtained through an acquisition and encompasses all the activities associated with the award, management, and closeout of the resulting contract. Pre-award activities encompass those actions conducted prior to award of a contract, including development and release of the solicitation, evaluation and source selection, and negotiation and award of a contract. Post-award activities include the actions associated with management of the contract to include technical and financial monitoring, development and issuance of work assignments, delivery orders or task orders, execution of contract modifications, and contract closeout. All acquisition activities must comply with the Federal Acquisition Regulation (FAR) and Environmental Protection Agency (EPA) Acquisition Regulation (EPAAR).

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<sup>1</sup>A Guide to the Project Management Body of Knowledge (PMBOK Guide) Third Edition 2004 (Chapter 12 – Project Procurement Management)

## 2. Approach

This section explains the approach used to develop the procurement management procedure. It details the assumptions, the degree of scalability of the procedures, and the industry standards, best practices, and EPA current practices consulted in creating this procedure.

### 2.1 Assumptions

The following assumptions guide this procurement management procedure:

- These procedures are intended for OETI project staff and do not encompass the procurement activities that are completed by EPA's Office of Acquisition Management (OAM).
- Specific processes for procurement management may vary based on the complexity of the procurement and resulting contract, procurement type, dollar value, contract type (fixed price versus time and materials), the number of contracts and Contractors and contract duration among other variables.

### 2.2 Scalability

This procurement management procedure applies if a product or service will be procured from a vendor to meet project objectives. The FAR, EPAAR, and other internal acquisition policies mandate specific procurement actions.

The users of this procedure may tailor or scale some of its component activities based on the details associated with a specific procurement and/or contract. The procedure, however, remains the same. The activities required as well as the degree of engagement by the program office are dependent on a number of factors. These factors include:

- Type of procurement (use of existing vehicle versus new award).
- The level of competition required (sole source versus competitive award, full and open versus small business set-aside, etc.).
- Complexity of requirement being acquired (acquiring commercial off-the shelf [COTS] items versus new development).
- Dollar threshold of procurement/contract (higher values increase documentation and approvals required).
- Type of contract (multiple award versus single award, indefinite delivery/indefinite quantity [ID/IQ] contract requiring issuance of work assignments or delivery/task orders, award fee contracts requiring periodic award fee determinations, etc.).
- Degree of oversight required after award (number of work assignments (WAs), delivery orders (DOs), or task orders (TOs) to be issued, complexity of performance metrics/deliverables to be monitored, degree of risk associated with meeting schedule, performance and/or cost objectives, etc.).
- The Contracting Officer (CO) assigned to the procurement and/or contract.
- The responsibilities the CO delegates to the Contracting Officer's Representative (COR).

Ultimately, the assigned CO has the authority to decide which activities will be performed by the program office and the documentation required for the specific engagement. Consequently, the users of the procedure should discuss the tailoring of the activities and documentation required for both pre-award and post-award actions with the assigned CO.

## 2.3 Best Practices

The OETI project management vision includes the employment of best practices from both industry and the EPA. This procedure incorporates the following best practices and existing regulations and policies:

- **EPA regulations and standards**

- U.S. Environmental Protection Agency (EPA) Environmental Protection Agency Acquisition Regulation (EPAAR). 2002. Available: <http://www.epa.gov/oamrfp12/ptod/epaar.pdf>
- EPA Contracts Management Manual, October 19, 2006. Available: <http://epawww.epa.gov/oamintra>. The Implementation of the Continuing Learning Policy for the USEPA Acquisition Workforce Members update to be incorporated into the manual at a later date.
- EPA Contracting Officer's Representative (COR) Training Text - U.S. Environmental Protection Agency. Office of Acquisition Management. 2005 Edition. Available: <http://epawww.epa.gov/oamintra/policy/cmm.pdf>
- EPA Order 19001A, Use of Contractor Services to Avoid Improper Contracting Relationships. Available: <http://epawww.epa.gov/oamintra>

- **Federal regulations, industry standards, and best practices**

- Federal Acquisition Regulation (FAR) – General Services Administration, Department of Defense, National Aeronautics and Space Administration. 2006. Available: <http://www.arnet.gov/far/>
- Project Management Institute Project Management Body of Knowledge (PMBOK®), Third Edition, 2004.
- Seven Steps to Performance-Based Services Acquisition, an Interagency-Industry Partnership in Performance, 2006. Available: [http://www.acqnet.gov/comp/seven\\_steps/introduction.html](http://www.acqnet.gov/comp/seven_steps/introduction.html)
- Contracting Officer Representative: Managing the Government Technical Experts to Achieve Positive Contract Outcomes. A report to the President and Congress of the United States by the US Merit Systems Protection Board. 2006. Available: <https://acc.dau.mil/getattachment.aspx?id=22128&pname=file&aid=2113>
- A Guide to Best Practices for Performance-based Service Contracting - Office of Federal Procurement Policy, Office of Management and Budget, Executive Office of the President. 1998. Available: [http://www.whitehouse.gov/omb/procurement/pbsa/guide\\_pbsc.html](http://www.whitehouse.gov/omb/procurement/pbsa/guide_pbsc.html).

### 3. Roles and Responsibilities

This section presents the roles and responsibilities for the key staff from both OAM and OETI involved in procurement management activities. Although this procedure is intended for OETI project management staff, OAM staff roles have been included to help distinguish the roles and responsibilities between OETI project staff and the contracting office.

The key staff include the:

- CO and Contract Specialist assigned from OAM. The CO has ultimate responsibility for the procurement and resulting contract.
- OETI Project Manager who has ultimate responsibility for the project the procurement is supporting and allocating the necessary funding.
- OETI COR delegated by the CO to provide technical oversight on the procurement and/or contract.
- OETI Project Team Lead(s) that may be requested to provide subject matter expertise to the Project Manager and COR in vendor evaluations or Contractor oversight activities.

After contract award, the CO frequently delegates contract administration duties to CORs within the project office. Depending on its complexity, the contract may warrant a multi-tiered structure for CORs with the CO assigning a Contract-Level COR and supporting CORs. The different types of CORs include:

- **Contract-Level COR** – A COR appointed to act as the CO's primary representative on a contract. The Contract-level COR monitors the overall contract and, when applicable, is responsible for overseeing the work assignment, delivery order, or task order CORs. In some cases the contract-level COR may be responsible for both pre-award and post-award contract functions.
- **Delivery Order (DO) COR** - A COR appointed to an indefinite-delivery type contract or other acquisition instrument by which contractor supplies are ordered through separately funded "delivery orders" awarded by the CO. This designation includes CORs functioning on orders for supplies under General Services Administration (GSA) Multiple Award Schedule (MAS) contracts, Government-wide Acquisition Contracts (GWACs), and Multiple Award Contracts (MACs).
- **Task Order (TO) COR** - A COR appointed to an indefinite-delivery type contract or other acquisition instrument by which contractor tasks or services are ordered through separately funded "task orders" awarded by the CO. This designation includes CORs functioning on orders for services under GSA MAS contracts, GWACs, and MACs.
- **Work Assignment (WA) COR** - A COR appointed to a cost-reimbursement type contract by which contractor services are ordered through "work assignments" issued by the CO. In contrast to a task order, a work assignment is not a separately funded document.
- **Simplified Acquisition COR** - A COR appointed to simplified acquisitions for either supplies or services. Typically, simplified acquisitions do not require a COR. However, for complex requirements, the CO may determine that it is in the government's interest to appoint a COR.

Section 4.2.1 provides more information on the assignments of CORs and explains when a multi-tiered approach is appropriate.

Table 3-1 presents the roles and responsibilities for OETI project staff involved in procurement management activities. This table lists functions or tasks that each project role performs. While each



role will be assigned to an individual staff member, an individual may perform multiple roles for a project.

**Table 3-1. Procurement Management Roles and Responsibilities**

Role Definition	Responsibilities
<b>OAM</b>	
<b>Contracting Officer (CO)</b>	<ul style="list-style-type: none"> <li>Provides guidance on procurement methods and different contracting vehicles</li> <li>Issues COR delegations</li> <li>Approves Acquisition Strategy and Acquisition Plan document</li> <li>Reviews and approves Procurement Initiation Notice (PIN) or procurement packages (OAM uses the term "work package" in its COR Training Text), including modification requests, submitted by Contract-Level COR</li> <li>Publicizes new contracting actions</li> <li>Releases solicitations for new awards or WAs/DOs/TOs</li> <li>Oversees evaluation and source selection and debriefing of offerors</li> <li>Conducts negotiations</li> <li>Awards contracts and issues WAs/DOs/TOs to contractor and obligates funds</li> <li>Issues all contract modifications</li> <li>Establishes and maintains contract files</li> <li>Formally approves proposals/work plans and notifies contractor of approval</li> <li>Discusses problems and/or need for corrective action with Contract-Level COR and Contractor as necessary</li> <li>Reviews financial progress reports for overall contract</li> <li>Reviews all exceptions to invoices; determines final payment after reviewing all data</li> <li>Transfers carryover funds to contract for next fiscal year</li> <li>Determines award fee pool (if applicable to contract type) and notifies contractor of award fee amount through contract modification</li> </ul>
<b>Contracts Specialist</b>	<ul style="list-style-type: none"> <li>Supports CO in execution of CO responsibilities</li> <li>Supports review of procurement packages and processing of contract actions</li> </ul>
<b>OETI</b>	
<b>Project Manager</b>	<ul style="list-style-type: none"> <li>Facilitates approval of Acquisition Strategy and Acquisition Plan document for new requirements</li> <li>Reviews and facilitates approval of PIN packages for new contract awards</li> <li>Provides technical personnel to support evaluation of proposals</li> <li>Nominates personnel for CORs and evaluation panels</li> <li>Reviews and approves scope of DOs, TOs, and WAs</li> <li>Allocates funding for contract actions</li> <li>Participates in review of project deliverables</li> <li>Works with CO/COR to facilitate resolution of contract disputes</li> <li>Provides input on contractor performance</li> </ul>
<b>Contract-Level COR (also referred to as Project Officer<sup>2</sup>)</b>	<ul style="list-style-type: none"> <li>Acts as the primary authorized representative of a CO on overall contract<sup>3</sup>.</li> <li>Develops Acquisition Strategy and Acquisition Plan document for new requirements</li> <li>Develops PIN packages for new procurements</li> </ul>

<sup>2</sup>Note: For the purpose of this procedure, the term "Project Officer" is used to describe the party responsible for activities that may occur prior to a COR delegation being established. Once COR delegation has been established, the term "COR" will be used in place of "Project Officer".

<sup>3</sup>Note: CO appointment of a COR does not grant authority to enter into contractual agreements or amendments. CORs may perform only those functions delegated to them, and must not take any action reserved for the CO.

Role Definition	Responsibilities
	<ul style="list-style-type: none"> <li>• Participates in evaluation panels as assigned</li> <li>• Monitors overall contract and tracks orders placed under the contract</li> <li>• Oversees activities of the WA/DO/TO CORs (when applicable)</li> <li>• Prepares COR designation form</li> <li>• Reviews WA/DO/TO procurement packages developed by WA/DO/TO CORs and submits to CO (includes reviewing/editing of Statements of Work [SOWs]/Statements of Objectives [SOOs] and cost estimates)</li> <li>• Has responsibility for overall COR contract file management; coordinates responsibilities for recordkeeping among WA/DO/TO CORs</li> <li>• Reviews proposals/work plans and recommendations by WA/DO/TO COR and recommends approval/disapproval to CO</li> <li>• Participates, as requested, in negotiations with CO and contractor</li> <li>• Reviews progress reports</li> <li>• Reviews deliverables and WA/DO/TO COR recommendations (when applicable); approves or rejects deliverables</li> <li>• Provides technical direction</li> <li>• Discusses problems with WA/DO/TO COR and contractor; alerts CO</li> <li>• Reviews financial progress reports for WA/DO/TO and overall contract</li> <li>• Approves or takes exception to invoices</li> <li>• Attempts to resolve questioned items with contractor</li> <li>• Identifies and discusses need for corrective actions with WA/DO/TO COR and contractor</li> <li>• Submits requests for carryover funds to CO</li> <li>• Evaluates need for amendment/modifications including requests from WA/DO/TO COR(s); submits request to CO</li> <li>• Determines need for modification to overall contract (addition of funds, change in key personnel); submits request to CO</li> <li>• Compiles Performance Event Reports, as necessary</li> </ul>
WA/DO/TO COR	<ul style="list-style-type: none"> <li>• Acts as the authorized representative of a contracting officer<sup>4</sup> on a specific WA, DO and/or TO</li> <li>• Plans work and develops procurement packages (to include SOWs/SOOs and cost estimates) and submits to Contract-Level COR for review</li> <li>• Establishes and maintains COR contract file</li> <li>• Reviews contractors' proposals/work plans, solicits and consolidates other reviewers' feedback (as needed), and recommends approval/disapproval to Contract-Level COR</li> <li>• Participates, as requested, in negotiations with CO and contractor</li> <li>• Reviews progress reports and deliverables, solicits and consolidates other reviewers' feedback (as needed), and recommends approval/disapproval to Contract-Level COR</li> <li>• Provides technical direction and conducts progress meetings with contractor</li> <li>• Identifies and discusses problems with contractor; alerts Contract-Level COR and CO</li> <li>• Reviews invoices; identifies questionable items. Attempts to resolve questioned items with contractor. Submits findings to Contract-Level COR and CO</li> <li>• Forecasts carryover funds</li> <li>• Determines need for amendment to WA/modification to TO/DO for any increase/decrease of hours, tasks, deliverables, or change to schedule and submits request to Contract-Level COR</li> <li>• Completes Performance Event Report evaluating contractor performance for individual</li> </ul>

<sup>4</sup>Note: CO appointment of a COR does not grant authority to enter into contractual agreements or amendments. CORs may perform only those functions delegated to them, and must not take any action reserved for the CO.

Role Definition	Responsibilities
	<p>TO/WA</p> <ul style="list-style-type: none"><li>• Ensures that equipment is being used in accordance with terms of WA/DO/TO and ensures return of government furnished property (GFP) at the end of the contract</li><li>• Determines need to closeout WA/TO/DO, i.e.; all tasks and deliverables completed); alerts Contract-Level COR and CO</li></ul>
Project Team Lead(s)	<ul style="list-style-type: none"><li>• Provides subject matter expertise as requested</li><li>• Participates in review of project deliverables</li><li>• Participates in technical evaluation panels as assigned</li><li>• Works with CO/COR to facilitate resolution of contract disputes</li><li>• Provides input on contractor performance</li></ul>

## 4. Procedure

This section presents the process flow for procurement management for OETI projects and describes each step of the process in detail.

### 4.1 Process Flow Diagram

Figure 4-1 identifies the process for procurement management. This process originates with determination of a requirement to be placed under contract during the *PMP-02 Project Initiation and Planning Procedure*. Procurement activities begin when a CO and COR are assigned and continue through development of the acquisition strategy and relevant procurement documentation, solicitation of proposals, selection of sources, contract award, contract administration, and closeout of the contract. This figure represents the procurement management activities associated with OETI project staff. It does not include the functions performed by the EPA contracting office.

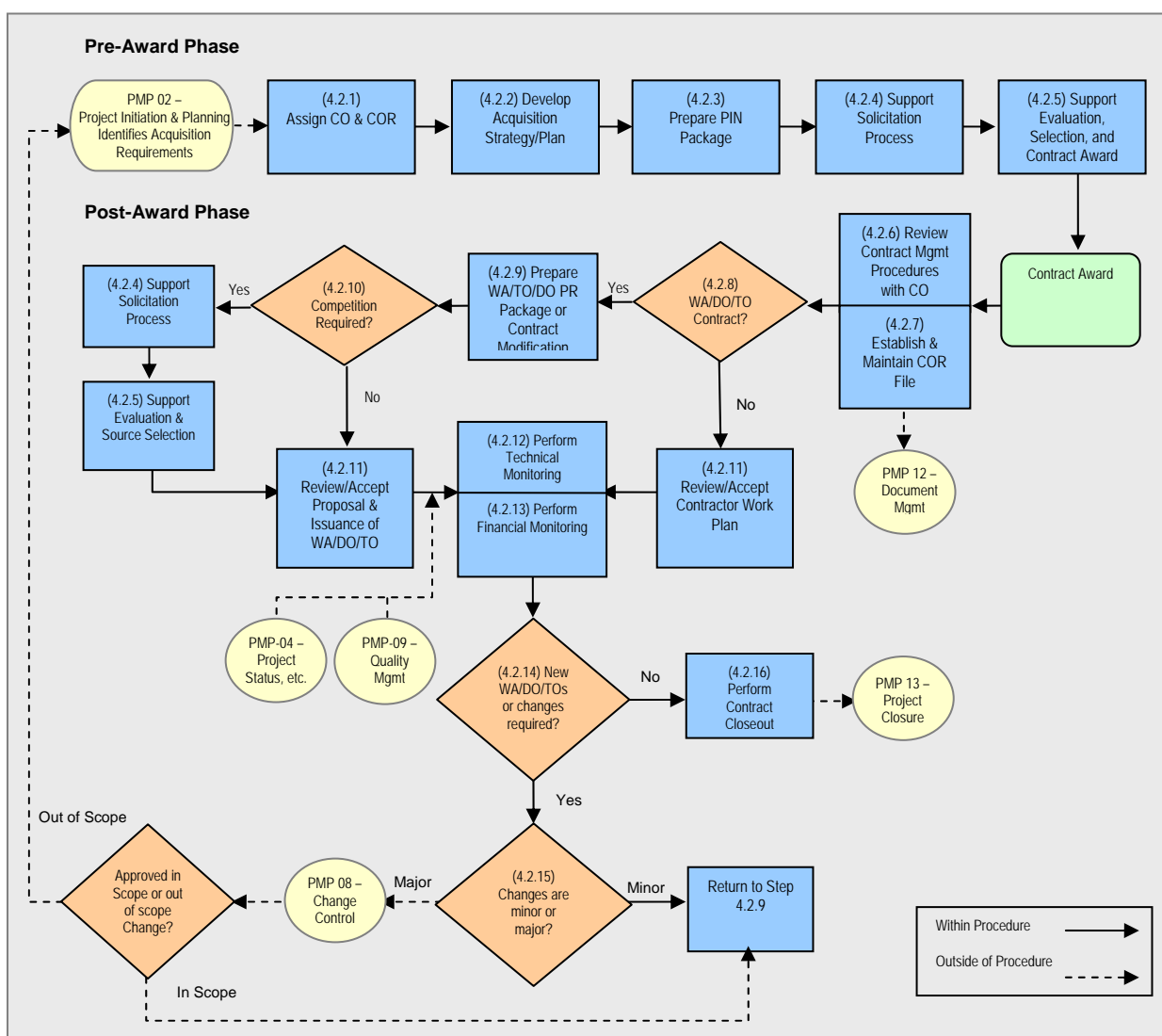


Figure 4-1. Procurement Management Process

## 4.2 Steps

The following sections describe the steps of the procurement management process shown in Figure 4-1 and the roles involved with its execution.

### 4.2.1 Assign Contracting Officer and Contracting Officer's Representative

To initiate the procurement process, the Project Manager and/or Project Officer<sup>5</sup> must contact OAM to request that a CO be assigned to support a specific procurement and/or contract action to obtain the identified required goods or services. The Project Manager and/or Project Officer should meet with the CO to determine if the action warrants delegation of a COR. If a new COR appointment is needed, the Project Manager and/or Project Officer should identify appropriate candidates based on the skill set desired by the CO. The potential COR's immediate supervisor then recommends a candidate by submitting EPA Form 1900-65, *Nomination of Contracting Officer's Representatives*, to the CO. The CO will respond to the nomination in writing by either appointing the nominee as a COR or stating why the nominee was not appointed. If the nominated COR is not approved, the Project Manager and/or Project Officer will need to nominate an alternative COR candidate. The CO will provide written instructions regarding the approved COR's responsibilities under the procurement. At this stage only a Contract-Level COR is established.

All CORs must file Office of Government Ethics Form 450, *Confidential Financial Disclosure Report*, with their respective organizations' designated ethics Officials. A list of Agency ethics officials is available on the Agency intranet at <http://intranet.epa.gov/ogc/ethics.htm>. In addition, CORs must have completed appropriate COR training. CORs may choose between two courses: the Defense Acquisition University (DAU)'s on-line COR training course, "COR With a Mission Focus" or OAM's COR Training Course. After completing one of these courses, CORs must complete OAM's Recertification Course every three years to remain eligible. CORs must also obtain 40 Continuous Learning Points (CLP) within each two-year cycle. Employees who are not current in their training requirements cannot serve as CORs. See the *Contracts Management Manual*, October 19, 2006 (Section 42) and the *Implementation of the Continuing Learning Policy for the USEPA Acquisition Workforce Members* update for more information on available COR training.

### 4.2.2 Develop Acquisition Strategy/Plan

Once the CO and COR have been established, the Contract-Level COR can seek guidance from the CO to determine the best acquisition strategy for satisfying the defined set of requirements. Potential procurement alternatives include using one or more of the following:

- Existing EPA contract.
- GSA MAS contracts.
- EPA blanket purchase agreements (BPAs).
- GWACs.
- MACs.
- New procurement.

The CO can also provide the COR with information on how to access existing vehicles and the fees associated with using established vehicles. In addition, OAM guidance document, "GWACs and

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<sup>5</sup> Note: For the purpose of this procedure, the term "Project Officer" is used to describe the party responsible for activities that may occur prior to a COR delegation being established. Once COR delegation has been established, the term "COR" will be used in place of "Project Officer".

*Other Alternative Contractual Vehicles*” lists a variety of contracts and discusses procedures for using them. This guide is available at <http://intranet.epa.gov/oamintra/policy/index.htm>.

If a procurement is above the simplified acquisition threshold (\$100,000), an Acquisition Plan is required. The Contract-Level COR should develop the required Acquisition Plan in accordance with the specified format in FAR Subpart 7.1 – “Acquisition Plans.” See Chapter 7, “Acquisition Planning” in the *Contract Management Manual* for additional information on development of acquisition plans.

#### ***4.2.3 Prepare Procurement Initiation Notice (PIN) Package/Solicitation Document***

EPA program offices and OAM follow the PIN process to work through the pre-award phases. For all procurements above the FAR threshold for simplified acquisition, the requiring office initiates contact with the contract service center/branch through use of a PIN. This notice captures a set of basic information and establishes the responsibilities of the program office. It includes program and other approvals to show the full intent and "commitment" of the program to pursue a contract as the vehicle to meet its requirement(s). Additionally, for all funded procurements, the requiring office will also submit a completed EPA Form 1900-8, *Procurement Request/Order*. For unfunded procurements, the PIN replaces the planning procurement request (PR). The purpose of the PIN process is to promote dialogue early in the pre-award process between the requiring office and the contract service center prior to preparation of key documents. For a complete explanation of the PIN process, see Chapter 2 of the *Contracts Management Manual*.

The Contract-Level COR prepares the PIN, which formally initiates the procurement process within OAM, identifies key program officials, and provides basic information about the requirement. The COR and Project Manager are responsible for obtaining all required approvals prior to submission to the CO. Required approvals vary depending on the size and complexity of the procurement. The COR and/or Project Manager should check with the Office of Program Management, to determine the appropriate levels of review prior to submission to the contracting office.

The following lists the standard information a PIN package includes, however, refer to the *Contract Management Manual* for a comprehensive list:

- PIN Form.
- Form 1900-65A, *Nomination of Contracting Officer's Representative*.
- PIN Questionnaire (to be completed during meeting with Project Manager/COR and CO).
- SOW or SOO.
- Acquisition Plan (completed under step 4.2.2 above).
- Independent Government Cost Estimate (IGCE).
- Budget Information.
- Market Survey Information.
- Evaluation Criteria.
- Deliverables.
- Labor Categories.
- Quality Assurance Surveillance Plan (QASP).
- Quality Assurance Review Forms.
- Information Technology Information.
- Organization Conflict of Interest Information.

- Justification for Other than Full and Open Competition.

Guidance on development of SOWs and IGCEs can be found in Chapter 3, "Preparation of Work Assignments, Delivery and Task Orders" in the *EPA Contracting Officer's Representative (COR) Training Text*. Guidance on development of performance-based SOWs and QASPs can be found in the *Contract Management Manual*, Chapter 11, "Describing Agency Needs."

#### **4.2.4 Support Solicitation Process**

After approval of the PIN package the CO will initiate the procurement, which frequently results in issuance of a solicitation to obtain vendor proposals. This solicitation can take the form of either a request for proposal (RFP) or an invitation for bid (IFB). The solicitation process encompasses all the activities associated with developing a solicitation, releasing it, and obtaining proposals. These activities include finalizing the solicitation document, releasing it to industry, obtaining and responding to industry questions, and modifying the solicitation (as needed). The Contract-Level COR should assist with these activities as desired by the CO. This may include assisting in the development of solicitation sections not already developed as part of the PIN package; providing updates to the SOWs/SOOs, QASP, and other required documents; and reviewing the final solicitation developed by the contracting office. Additional activities may also include reviewing and evaluating comments received from industry on the solicitation, assisting with industry days or pre-proposal conferences, responding to vendor questions, and advising on potential solicitation amendments.

#### **4.2.5 Support Evaluation, Selection, and Contract Award**

The Project Manager is responsible for providing technical personnel to support evaluation of proposals in support of projects he or she initiates. Depending on importance of the effort, either the Contract-level COR or the Project Manager should identify and nominate personnel with the appropriate mix of subject matter expertise to assist with the evaluation of proposals. Evaluation team members are responsible for reviewing the proposals and/or oral presentations in accordance with the established source selection plan and documenting findings. The evaluation team members may support the CO in development of proposal clarifications and discussions with offerors. The CO may also request that evaluation team members aid in negotiations with the selected offeror(s) and the finalization of the contract prior to award. In addition, the CO may ask members to assist with debriefings of offerings and provide information related to vendor protests (if applicable).

A simplified version of this evaluation process may also be used when conducting evaluation of proposals for a task or delivery order issued under a multiple award ID/IQ contract.

#### **4.2.6 Review Contract Management Procedures with Contracting Officer**

At the time of contract award, the Contract-Level COR (and for more complex actions the Project Manager) needs to finalize the specific manner in which a contract will be managed with the CO. In particular, the CO should consider and potentially update COR delegation needs. Although a Contract-level COR may have been assigned to support the pre-award activities, the CO may need to adjust the Contract-level COR's roles and responsibilities and designate additional CORs to support the management of specific DOs, TOs, or WAs. Factors that influence the need for a multi-level COR structure include:

- A number of DOs, TOs, or WAs will be issued under the contract, with efforts occurring in parallel.
- The effective management of the different DOs, TOs, or WAs requires different types of expertise.



- The project being implemented is a high priority and/or high risk to EPA.
- DOs, TOs, or WAs are complex to manage, requiring:
  - Tracking and review of diverse and/or frequently submitted deliverables.
  - Extensive configuration management of changes (e.g., software).
  - Complex inspection and testing requirements.
  - Frequent interaction with contractor.
  - Ambitious schedule, cost, and/or performance objectives.

Once the COR or CORs have been designated, the CORs should meet with the CO to ensure they fully understand their responsibilities and the required involvement of the CO in such key activities as:

- Contract/task kick-off initiation process.
- Deliverable tracking, review, and approval process.
- Government Inspection and Acceptance Testing process (if applicable).
- Invoice review process.
- Performance and financial review process (to include evaluation of performance-based objectives/service level agreements if applicable).
- Change Control/Contract Modifications process.
- Issue/Dispute Resolution Process.
- COR file management (see Section 4.2.7 below).

#### ***4.2.7 Establish & Maintain COR File***

In parallel with Step 4.2.6, the COR should establish a strategy for maintaining the COR Contract File throughout the life of the contract and properly archiving the file upon contract closeout. The CO has the ultimate responsibility for maintaining contract records. However, the CO typically delegates the responsibility for COR-related records to the Contract-Level COR who may, in turn, delegate responsibility for maintaining certain records to the WA/DO/TO CORs. Close coordination among all of the CORs on the contract is necessary to ensure that all appropriate records are maintained and easily accessible. Ultimately, CORs are responsible for creation and upkeep of the COR-related records in accordance with Agency National Records Management Program policy, Federal Acquisition Regulations, Federal Records Act, and *PMP-12 Document Management Procedure*.

The file management strategy should address the role of each COR in the management of the overall contract file. At a minimum, the contract files should provide an audit trail of the actions taken under the contract, WA, DO, or TO. The COR should maintain these files using a system that is consistent, logical, and properly safeguarded. The system should maintain information that would allow someone taking over COR duties to ascertain which deliverables have been accepted, if any deliverables are late, how much money remains on the order, a history of technical direction, and so forth. Files are also subject to audit by officials within the Agency, such as the Office of the Inspector General (OIG), or outside the Agency, such as the Government Accountability Office (GAO). The agency may also be required to release certain documents to outside parties under the Freedom of Information Act (FOIA). Thus, it is very important that files are accurate and current.

The types of records that should be maintained in the contract management file include:

1. Basic contract documentation.



2. Procurement packages (the documents sent to the CO to award the contract or issue a work assignment).
3. COR designation documentation.
4. Contractor's work plans and/or DO/TO proposals with documented government comments.
5. Work assignments, Delivery/Task Orders, Contract Modifications, etc., signed by the CO.
6. Documentation of technical direction.
7. Invoices and monthly progress reports and record of reviews.
8. Correspondence and meeting minutes related to the contract or order.
9. Deliverables and record of reviews and acceptance or rejection.
10. Test and acceptance documentation.
11. Documentation on Government Furnished Property (GFP).
12. Documentation supporting formal performance reviews, contract issues discussed with contractor, etc.

Guidance on COR file management can be found in Chapter 7 *"Establishing Project Files and Handling Sensitive Information"* in the *EPA Contracting Officer's Representative Training Text*. EPA Schedule 202, Contract Management Records, is also available on the Internet at <http://www.epa.gov/records/policy/schedule/sched/202.htm>.

#### ***4.2.8 WA/DO/TO Contract?***

Management of ID/IQ contracts requires the additional action of issuing separate WAs, DOs, TOs to obtain the needed contractor supplies or services. This step depicts the additional activities associated with issuing WAs, DOs, or TOs as delineated in Steps 4.2.9 through 4.2.11. If the contract does not require issuance of separate WAs, DOs, or TOs, the COR can move directly to Step 4.2.11.

#### ***4.2.9 Prepare WA, DO, TO Procurement Request Package or Contract Modification***

Obtaining work under a contract (whether by a DO, TO, or WA) or changing the contract through a contract modification requires development of a PR package. Elements of the PR package include the PR form (EPA Form 1900-8) and supporting documentation such as the SOW/SOO, QASP, and IGCE. In addition, a complete package may also include the following:

1. Cover Sheet or Memo WA, TO, or DO Form.
2. Contracting Officer's Representative Nomination Form (EPA Form 1900-65).
3. Copy of the Certificate of Training.
4. Quality Assurance Review Form.
5. Non-duplication of Effort Statement (required by some contracting offices).
6. Senior Information Official (SIO) approval for IT services (as needed).
7. Approval for use of multiple appropriations (as needed).
8. Intra-agency funding request and approval (as needed).

9. GFP worksheet.

10. Justification and Approval for Sensitive and/or Vulnerable Services (as needed).

The WA/DO/TO COR develops the PR package and submits it to the Project Manager and Contract-level COR for review. The Project Manager ensures that the scope of the effort is appropriate and that funding is available to support the effort. The Contract-level COR ensures the package is current, accurate, and complete before forwarding to the CO for action. The CO reviews and approves the package and executes the appropriate action. Guidance on development of SOWs and IGCEs can be found in Chapter 3, "Preparation of Work Assignments, Delivery and Task Orders" in the *EPA Contracting Officer's Representative Training Text*. Guidance on development of performance-based SOWs and QASPs can be found in *Contract Management Manual*, Chapter 11, "Describing Agency Needs."

At any time, a COR and/or Project Manager may also identify potential changes to an existing DO/TO/WA or basic contract. The COR or Project Managers should discuss changes with the CO to determine if they are within scope of the contract and appropriate prior to development of the PR Package. In addition, the COR and Project Manager need to follow the applicable change control process outlined in *PMP-08 Change Control Procedure* to manage project changes.

#### ***4.2.10 Competition Required?***

In many of the existing multiple award vehicles, the contract will require that the WAs, DOs, or TOs be competed at a minimum from three potential sources. As a result, additional actions may be required to solicit and evaluate the proposals and make a final selection. The Contract-Level COR may need to perform a simplified form of the activities described under steps 4.2.4 and 4.2.5 described above. The COR should discuss the competition requirements with the CO to determine which steps are necessary for a particular procurement.

#### ***4.2.11 Review/Accept Proposal & Issuance of WA/DO/TO; Review/Accept Work Plan***

The COR is responsible for reviewing work plans and proposals submitted by the contractor under the contract. The WA/DO/TO COR is responsible for performing a detailed review of the work plan or proposal, identifying appropriate personnel that should be involved in the review process, consolidating review comments, and making a recommendation to the Contract-Level COR. The Project Team Lead(s) and Project Manager are responsible for providing input to the COR(s) as requested. The COR should recommend to the Contract-Level COR one of four actions:

1. To accept the work plan as presented.
2. To negotiate changes to the work plan with the Contractor.
3. To amend the statement of work for the work assignment. This may involve adding or deleting tasks or deliverables, changing the period of performance, or changing the labor hour estimate.
4. To amend the SOW of the WA/DO/TO; this is frequently done in conjunction with the CO's negotiations with the contractor.

The Contract-Level COR will review and make a final recommendation to the CO who will carry out one of the four actions listed above. The CO is the only individual with negotiation and amendment authority. However, the Contract-Level and/or WA/DO/TO COR may be requested by the CO to assist in negotiations. If a change is required, the resulting procedure for preparing an amendment/modification request should be discussed among the CORs and the CO. The body of the amendment/modification may be written by the COR, but only the CO has the authority to issue it.

The COR should prepare a memorandum to the Contract-Level COR addressing the need for the amendment/modification and providing appropriate background information. The Contract-Level COR should review the request and submit it to the CO for action. Guidance on reviewing work plans and proposals can be found in Chapter 4, "Reviewing the Contractor's Work Plan" in the *EPA Contracting Officer's Representative Training Text*.

#### **4.2.12 Perform Technical Monitoring**

Once the TO, DO, or WA has been issued, and any plan submitted by the contractor for performing the effort including staffing and costs (if applicable) is approved, all assigned CORs are responsible for monitoring the contractor's performance to ensure that EPA obtains a quality product or service, on time, and within cost. Before commencing monitoring activities, all CORs should be thoroughly familiar with the requirements of both the basic contract and the tasking document. The COR should also determine whether the contract is performance-based and will require monitoring of specific performance metrics established under the contract or DOs or TOs. The Project Manager and Project Team Lead(s) have responsibility for providing feedback to the COR(s) on contractor deliverables and proposals, progress against schedule, and overall performance.

The Contract-Level and/or WA/DO/TO COR should develop a framework for conducting technical monitoring using the contract and the contractor's approved work plan or proposal. This framework should incorporate relevant processes described in *PMP-04 Project Status, Reporting and Forecasting Procedure* and *PMP-09 Quality Management Procedure* for ensuring effective project monitoring and achievement of quality objectives. This framework should encompass development of a list of: each of the major tasks and all associated deliverables, a list of all reporting requirements and deadlines, and any specific inspection requirements and duties of the government to include in-progress reviews and other performance assessments. This list should be kept up-to-date by the COR and used as a tool for monitoring progress and determining the extent of contract completion. If the contract is performance-based, the COR is responsible for ensuring that surveillance of the contractor's performance is completed in accordance with the established QASP. The QASP describes how and when the government will monitor contractor performance. The COR is responsible for identifying and securing the appropriate staff to assist in conducting the delineated QASP reviews.

There are three areas in which the COR monitors the contractor's performance:

- Technical progress, quality of deliverables or services.
- Schedule compliance (meeting due dates).
- Staying within cost estimates in work plan.

The broad category of technical monitoring includes:

- Giving technical direction.
- Avoiding vulnerabilities related to technical monitoring.
- Reviewing deliverables.
- Conducting test and inspection.
- Conducting meetings.
- Reviewing monthly progress reports.
- Evaluating contractor performance (to include assessment against performance-based performance objectives and/or metrics and/or service level agreements).

Guidance on performing technical monitoring can be found in Chapter 5, "Monitoring the Contractor's Performance" of the *EPA Contracting Officer's Representative (COR) Training Text*. EPA also has specific guidance on the proper use of contract services: EPA Order 1900.1A, *Use of Contractor Services to Avoid Improper Contractor Relationships*. It is very important that all Agency employees, not just CORs, comply with this order when interacting with contractors. The order is available on the EPA intranet at: <http://epawww.epa.gov/oamintra/policy/eo19011a.pdf>. Specific guidance on management of performance-based contracts is provided in the Office of Federal Procurement Policy (OFPP) Guide, *Information on Best Practices for Performance-based Service Contracting*, also available on the intranet.

#### **4.2.13 Perform Financial Monitoring**

Invoice review is a critical function for managing public funds. CORs must (1) review contract invoices thoroughly for cost reasonableness, and (2) process invoices in a timely manner. Adherence to this practice will result in payment of costs which are allowable, allocable, and reasonable, and avoid interest penalties due on late payments.

CORs should closely examine and, when appropriate, question costs or suspend contractor payments. Every COR must indicate in his or her files that an invoice review was performed. CORs must maintain a file of all invoices, invoice review checklists, and other documentation associated with the invoices for the life of the contract. For EPA awarded contracts, CORs should use the Electronic Approval System (EASY), which allows invoices to be approved on-line. For non-EPA contracts, the Research Triangle Park (RTP) finance office will email a copy of the invoice to the COR along with instructions for approval. The COR reviews the invoice and, if appropriate, approves the invoice in an email back to RTP.

The Contract-Level COR is responsible for monitoring costs on the contract as a whole. However, for each delivery/task order contract, OETI shall determine whether the Contract-Level COR or second level COR will submit approval or disapproval to the paying office. In the case of WA contracts the WA COR coordinates with the Contract-Level COR on reviewing invoices but does not have authority to sign them. This process should be discussed with the CO as part of step 4.2.1.

Guidance on performing financial monitoring can be found in Chapter 6, "Financial Monitoring (Invoice Review Process)" in the *EPA Contracting Officer's Representative (COR) Training Text*. For more guidance, the Invoice Review Guide is available at <http://intranet.epa.gov/oamintra> by clicking on contract financial information. Chapter 11 of the EPA *Contracts Management Manual* also covers procedures for invoice review. It is available at the same site.

#### **4.2.14 New WAs, DOs, TOs or Changes Required?**

At any point in time during the project, the need for new WAs, DOs, TOS, or contract modifications may be identified. These requirements may be a result of follow-on work to an existing task, identification of a new approach/technology that would improve performance, or other circumstances. How these changes will be handled is dependent on the complexity of the change, which is addressed in step 4.2.15.

#### **4.2.15 Changes are Minor or Major?**

If the change impacts cost, performance, and/or schedule, it is considered a major change and will need to go through the change control process as described in the *PMP-08 Change Control Procedure*. A minor change is one that will not impact cost, performance, and/or schedule, such as changing designated personnel, submission addresses, etc. The COR should review the Change

Control Plan developed under the PMP-08 procedure for further guidance on the change control process.

If the requirement or change is within the scope of the basic contract or WA/DO/TO and is a minor change or has been approved by the Change Control Board, the COR should go back to step 4.2.9 to initiate the new WA/DO/TO or modification process, repeating steps 4.2.9 – 4.2.13. However, if the requirement is out of scope, the COR must return to project planning to determine the best way to satisfy the new requirement or change. Refer to *PMP-02 Project Initiation and Planning Procedure* for further details for project planning activities. Once a DO/TO/WA or overall contract has been completed, the DO/TO/WA or overall contract can be closed out as described in Section 4.2.16.

#### ***4.2.16 Conduct WA/DO/TO or Contract Close Out***

A contract is considered complete when all deliverables have been delivered and accepted (or all required services have been performed and accepted) and the period of performance (including all option provisions that have been exercised) has expired. Contracts that are physically complete must be administratively closed out, which involves the settlement of all outstanding contractual issues and the documentation of the file. The CO is responsible for closing out the contract with the assistance of the COR. Listed below are the tasks the COR will normally be responsible for performing in contract close out:

- Certifying that all technical requirements of the contract have been satisfied, that the products or services have been satisfactorily completed within the contract amount, and that the final report and all deliverables have been received and accepted.
- Reviewing and determining the accuracy of the contractor's reporting of inventions.
- Examining the completion voucher (in the case of cost reimbursement contracts).
- Evaluating the contractor's performance under the contract.

It is important that the Contract-Level CORs consider contractor evaluations carefully and maintain documentation that justifies their conclusions. These evaluations can later serve as the basis for evaluating the past performance of a potential contractor in consideration for award of future requirements. The CO can use good or bad experiences as a basis for judgment, making EPA's acquisition program more effective.

The duties of CORs do not end until contract close out is completed. It is essential that contract close out tasks be performed as promptly as possible and coordinated with the process explained in *PMP-13 Project Closure Procedure*.

## 5. Considerations

The following provides a list of general best practices that should be considered when conducting procurement management:

- Develop clear, well defined SOWs and delivery/task orders:
  - Clearly state the goods or services expected.
  - Ensure that roles and responsibilities are clearly differentiated among the contractor, the government and other support contractors.
  - Clearly define performance standards and measurable outcomes and include positive or negative performance incentives (when applicable).
  - Identify how performance will be evaluated and include a QASP as appropriate.
  - Identify constraints, schedules, deadlines, and any mandatory items.
  - Specify required deliverables, reporting obligations (see Appendix D) and payment terms.
- For information technology (IT) procurements, ensure that the SOW and/or resulting contract or WA/DO/TO adequately addresses key aspects related to IT such as licensing, hosting, technology insertion/refreshment, copyrights, data rights, etc.
- Get the procurement and legal office engaged early on in the procurement process. Obtain not only an assigned CO but an assigned legal point of contact at the onset of a procurement.
- Include staff that can provide the right set of expertise to review contractor proposals, deliverables, and provide overall input on contractor performance.
- Ensure that sufficient resources are available to handle vendor/contract management properly. In particular, ensure that adequate resources are allocated to execute the surveillance activities specified in the QASP and/or review of deliverables.
- Ensure that adequate time is provided in the project schedule for both pre-award and post-award contracting activities as these activities are frequently allocated insufficient time to complete all required activities and obtain the necessary approvals.
- Provide contractors adequate time to develop proposals and the government adequate time to review, negotiate, and accept proposals.

## Appendix A Acronyms

Abbreviation	Description
BPA	Blanket Purchase Agreement
CO	Contracting Officer
COR	Contracting Officer's Representative
DAU	Defense Acquisition University
DO	Delivery Order
DO COR	Delivery Order Contracting Officer's Representative
EASY	Electronic Approval System
EPA	Environmental Protection Agency
EPAAR	EPA Acquisition Regulation
FAI	Federal Acquisition Institute
FAR	Federal Acquisition Regulation
FOIA	Freedom of Information Act
GAO	Government Accountability Office
GFP	Government Furnished Property
GSA	General Services Administration
GWAC	Government-wide Acquisition Contract
ID/IQ	Indefinite Delivery/Indefinite Quantity
IFB	Invitation for Bid
IGCE	Independent Government Cost Estimate
IT	Information Technology
MAC	Multiple Award Contract
MAS	Multiple Award Schedule
OAM	Office of Acquisition Management
OEI	Office of Environmental Information
OETI	Office of Enterprise Technology and Innovation
OFPP	Office of Federal Procurement Policy
OIG	Office of the Inspector General
PIN	Procurement Initiation Notice
PR	Procurement Request
QASP	Quality Assurance Surveillance Plan
RFP	Request for Proposal
RTP	Research Triangle Park
SIO	Senior Information Official
SOO	Statement of Objectives
SOW	Statement of Work
TO	Task Order
TO COR	Task Order Contracting Officer's Representative
WA	Work Assignment
WA COR	Work Assignment Contracting Officer's Representative
WBS	Work Breakdown Structure



## Appendix B Checklist for Procurement Management

The following provides a checklist for the key activities associated with each step of this procurement management procedure.

Activities	Responsible Parties
<b>4.2.1 Assign Contracting Officer and Contracting Officer's Representative</b>	
<input type="checkbox"/> Contracting office contacted and CO assigned	Project Officer and/or Project Manager
<input type="checkbox"/> Met with the assigned CO to determine if the action warrants delegation of a COR	Project Officer and/or Project Manager, CO
<input type="checkbox"/> EPA Form 1900-65, Nomination of Contracting Officer's Representative, submitted to the CO	Project Officer and/or Project Manager
<input type="checkbox"/> COR delegation by the CO received	Project Officer/Contract-Level COR and/or Project Manager; CO
<input type="checkbox"/> Government Ethics Form 450, <i>Confidential Financial Disclosure Report</i> , submitted to designated ethics official by each COR	Contract-Level COR
<input type="checkbox"/> COR Training (initial or recertification) completed (within last three years) and 40 CLPs obtained (within two year cycle) for each COR	Contract-Level COR
<b>4.2.2 Develop Acquisition Strategy/Plan</b>	
<input type="checkbox"/> Procurement options for satisfying requirements discussed with CO: <ul style="list-style-type: none"> <li><input type="checkbox"/> Existing EPA contract</li> <li><input type="checkbox"/> GSA Multiple Award Schedule Contracts</li> <li><input type="checkbox"/> EPA BPAs</li> <li><input type="checkbox"/> Government-wide Acquisition Contracts</li> <li><input type="checkbox"/> Multi-agency Contracts</li> <li><input type="checkbox"/> New procurement</li> </ul>	Contract-Level COR and CO
<input type="checkbox"/> Research and evaluation on each relevant procurement option completed	Contract-Level COR and CO
<input type="checkbox"/> The acquisition strategy to include procurement methodology finalized with CO	Contract-Level COR, Project Manager, and CO
<input type="checkbox"/> Acquisition Plan completed and approved	Contract-Level COR, Project Manager, and CO
<b>4.2.3 Prepare PIN Package</b>	
<input type="checkbox"/> PIN package requirements established with CO	Contract-Level COR and CO
<input type="checkbox"/> Procurement Request (EPA Form 1900-8) package completed with the following relevant documentation: <ul style="list-style-type: none"> <li><input type="checkbox"/> PIN Form</li> <li><input type="checkbox"/> Form 1900-65A, Nomination of COR</li> <li><input type="checkbox"/> Copy of the Certificate of Training</li> <li><input type="checkbox"/> PIN Questionnaire (to be completed during meeting with CO)</li> <li><input type="checkbox"/> Acquisition Plan</li> </ul>	Contract-Level COR, Project Manager, and CO



Activities	Responsible Parties
<ul style="list-style-type: none"> <li><input type="checkbox"/> SOW or SOO</li> <li><input type="checkbox"/> IGCE</li> <li><input type="checkbox"/> Budget Information</li> <li><input type="checkbox"/> Market Survey Information</li> <li><input type="checkbox"/> Evaluation Criteria</li> <li><input type="checkbox"/> List of Deliverables</li> <li><input type="checkbox"/> Labor Categories</li> <li><input type="checkbox"/> Quality Assurance Surveillance Plan (QASP)</li> <li><input type="checkbox"/> Quality Assurance Review Forms</li> <li><input type="checkbox"/> Information Technology Information</li> <li><input type="checkbox"/> Organizational Conflict of Interest Information</li> <li><input type="checkbox"/> Non-duplication of Effort Statement (required by some contracting offices)</li> <li><input type="checkbox"/> Justification for Other than Full and Open</li> </ul>	
<input type="checkbox"/> Determined and obtained necessary approvals and submitted PIN package to CO	Contract-Level COR and Project Manager
<input type="checkbox"/> PIN Package approved by OAM	Contract-Level COR, Project Manager, CO
<b>4.2.4 Support Solicitation Process</b>	
<input type="checkbox"/> Supported CO in development of draft and final solicitation	Contract-Level COR
<input type="checkbox"/> Supported industry day and/or pre-proposal conference	Contract-Level COR
<input type="checkbox"/> Reviewed and developed responses to vendor questions on solicitation as directed by CO	Contract-Level COR
<b>4.2.5 Support Evaluation, Selection, and Contract Award</b>	
<input type="checkbox"/> Evaluation team members identified	Project Manager or Contract-Level COR, or WA/DO/TO COR
<input type="checkbox"/> Evaluation team members fully understand their role and responsibilities, the evaluation process methodology, and requirements of the procurement	Eval Team Member, CO
<input type="checkbox"/> Evaluation team members completed review of proposals and documented findings and clarifications	Eval Team Member, CO
<input type="checkbox"/> Contract or WA/DO/TO negotiated and awarded	CO, Eval Team Member (as required)
<b>4.2.6 Review Contract Management Procedures with Contracting Officer</b>	
<input type="checkbox"/> The contract management procedures (including COR structure and roles and responsibilities) pertaining to specific contract finalized with the CO	Project Manager, Contract-Level COR, CO
<input type="checkbox"/> <i>EPA Form 1900-65, Nomination of Contracting Officer's Representatives</i> , submitted to the CO for each COR	COR Supervisors
<input type="checkbox"/> COR Delegation by the CO for each COR received	CO, all CORs
<input type="checkbox"/> Government Ethics Form 450, Confidential Financial Disclosure Report submitted to designated ethics Official by each COR	All CORs
<input type="checkbox"/> COR Training (initial or recertification) completed (within last three years) and 40	All CORs

Activities	Responsible Parties
CLPs obtained (within two year cycle) for each COR	
<b>4.2.7 Establish and Maintain COR Contract File</b>	
<input type="checkbox"/> Strategy for maintaining COR Contract File established	Contract-Level COR and/or DO/TO/WA COR
<input type="checkbox"/> COR Contract File is updated on ongoing basis	Contract-Level COR and DO/TO/WA COR
<b>4.2.9 Prepare WA/DO/TO Procurement Request Package or Contract Modification</b>	
<input type="checkbox"/> PR package requirements established with CO	Contract-Level COR, CO
<input type="checkbox"/> PR (EPA Form 1900-8) package completed with the following relevant documentation: <ul style="list-style-type: none"> <li><input type="checkbox"/> SOW or SOO</li> <li><input type="checkbox"/> IGCE</li> <li><input type="checkbox"/> QASP (if applicable)</li> <li><input type="checkbox"/> Cover Sheet or Memo WA, TO, or DO Form</li> <li><input type="checkbox"/> Contracting Officer's Representative Nomination Form (EPA Form 1900-65)</li> <li><input type="checkbox"/> Copy of the Certificate of Training</li> <li><input type="checkbox"/> Quality Assurance Review Form</li> <li><input type="checkbox"/> Non-duplication of Effort Statement (required by some COs)</li> <li><input type="checkbox"/> SIO approval for IT services (as needed)</li> <li><input type="checkbox"/> Intra-agency funding request and approval (as needed)</li> <li><input type="checkbox"/> Government-Furnished Property worksheet</li> <li><input type="checkbox"/> Justification and Approval for Sensitive and/or Vulnerable Services (as needed)</li> </ul>	DO/TO/WA COR or Contract-Level COR, Project Manager, and CO
<input type="checkbox"/> Approvals on PR package and Funding Authorization obtained	DO/TO/WA COR or Contract-Level COR, Project Manager
<input type="checkbox"/> PR package submitted to CO	Contract-Level COR or DO/TO/WA COR, Project Manager, CO
<input type="checkbox"/> Approval of PR package by CO obtained	Contract-Level COR, CO
<input type="checkbox"/> TO, DO, WA or contract modification issued by CO	CO, All CORs
<b>4.2.11 Review/Approve Proposal or Work Plan</b>	
<input type="checkbox"/> Contractor's Technical/Mgmt/Staffing/Cost Plan and/or Proposal fully reviewed and findings documented	DO/TO/WA COR or Contract-Level COR, Project Manager and/or Team Leads
<input type="checkbox"/> Appropriate personnel for review (with appropriate mix of expertise) identified and briefed on project	
<input type="checkbox"/> Mechanism for obtaining and consolidating inputs has developed	
<input type="checkbox"/> Feedback obtained, consolidated, and reviewed	
<input type="checkbox"/> Recommendation developed.	
<input type="checkbox"/> Recommendation to Contract-Level COR submitted (if applicable)	DO/TO/WA COR or Contract-Level COR
<input type="checkbox"/> Recommendation to CO submitted	DO/TO/WA COR or Contract-Level COR

Activities	Responsible Parties
<input type="checkbox"/> Comments provided to contractor; discussions, clarifications, negotiations with Contractor conducted as required	CO, DO/TO/WA COR or Contract-Level COR
<input type="checkbox"/> Memorandum for contract file prepared for documenting review of plan/proposal and final resolution	DO/TO/WA COR or Contract-Level COR
<b>4.2.12 Perform Technical Monitoring</b>	
<input type="checkbox"/> Thorough review of basic contract and contractor proposal completed	All CORs, CO
<input type="checkbox"/> Framework for conducting technical monitoring established; methodology has been established for: <ul style="list-style-type: none"> <li><input type="checkbox"/> Tracking submission and acceptance of deliverables for each task against schedule requirements</li> <li><input type="checkbox"/> Obtaining and consolidating feedback on each deliverable, contractor proposal, and overall Contractor performance</li> <li><input type="checkbox"/> Conducting testing, inspection, and acceptance of requirements (if applicable)</li> <li><input type="checkbox"/> Conducting In-Progress Reviews and other performance reviews</li> <li><input type="checkbox"/> Conducting assessments against performance-based metrics/SLAs in accordance with QASP (applicable under a performance-based contract)</li> <li><input type="checkbox"/> Providing appropriate dialog with Contractor (e.g., conducting regular status meetings)</li> <li><input type="checkbox"/> Updating tracking mechanisms on a regular basis</li> </ul>	DO/TO/WA COR and Contract-Level COR
<input type="checkbox"/> Status reports submitted and reviewed on a regular basis	All CORs
<input type="checkbox"/> Progress against schedule reviewed on an ongoing basis	All CORs
<input type="checkbox"/> Costs against work plan and schedule are tracked on an ongoing basis	All CORs
<input type="checkbox"/> Status meetings are conducted with the contractor on a regular basis	All CORs
<input type="checkbox"/> Thorough review of each deliverable completed: <ul style="list-style-type: none"> <li><input type="checkbox"/> Feedback obtained and consolidated in accordance with framework established above</li> <li><input type="checkbox"/> Recommendations on acceptance or rejection made to Contract-Level COR (as appropriate) or CO</li> <li><input type="checkbox"/> Feedback provided to Contractor on deliverable</li> <li><input type="checkbox"/> Review findings and final results documented in contract file</li> </ul>	DO/TO/WA COR or Contract-Level COR
<input type="checkbox"/> Performance Reviews are being performed in accordance with contract and QASP (if applicable)	DO/TO/WA COR or Contract-Level COR
<input type="checkbox"/> Test, inspection, and acceptance is being performed in accordance with contract and framework established above (if required under the contract)	DO/TO/WA COR or Contract-Level COR
<b>4.2.13 Perform Financial Monitoring</b>	
<input type="checkbox"/> Framework for evaluating and approving invoices developed: <ul style="list-style-type: none"> <li><input type="checkbox"/> Developed checklist appropriate for invoice review</li> <li><input type="checkbox"/> Developed invoice tracking mechanism (e.g., excel spreadsheet)</li> </ul>	DO/TO/WA COR and Contract-Level COR

Activities	Responsible Parties
<input type="checkbox"/> Invoices are being reviewed and approved in a timely manner	DO/TO/WA COR or Contract-Level COR
<input type="checkbox"/> Issues identified have been raised to Contract-Level COR or CO and have been addresses with contractor	DO/TO/WA COR or Contract-Level COR
<b>4.2.14 Conduct WA/DO/TO or Contract Closeout</b>	
<input type="checkbox"/> Certified that all technical requirements of the contract satisfied, that the products or services have been satisfactorily completed within the contract amount, and that the final report and all deliverables received and accepted	DO/TO/WA COR or Contract-Level COR
<input type="checkbox"/> Completed and submitted contractor Past Performance Evaluation	DO/TO/WA COR or Contract-Level COR

## Appendix C Additional Resources

The following provides a list of key resources and references associated with the procurement management procedure that can be used to assist in completion of the activities.

	Form/ Guidance	Source	Website
1.	Guidance on preparing PIN packages: PIN Process Flow Chart Procurement Initiation Notice PIN Questionnaire Checklist of PIN package Attachments/Approvals Justification for Other than Full and Open Competition	Chapter 7, "Acquisition Planning," of the EPA Contracts Management Manual, Section 7.3 Procurement Initiation and Related Documentation	<a href="http://epawww.epa.gov/oamintra">http://epawww.epa.gov/oamintra</a>
2.	Guidance on COR Delegations: COR Nomination Form (1900.65) COR Sample CO Designation Memorandum	EPA Contracting Officer's Representative (COR) Training Text, Chapter 1, "The Basics of Contracts and Roles and Responsibilities"	<a href="http://epawww.epa.gov/oamintra/policy/cmm.pdf">http://epawww.epa.gov/oamintra/policy/cmm.pdf</a>
3.	Guidance on COR Training	EPA Contract Management Manual, Chapter 42, "Contract Administration and Audit Services" and the <i>Implementation of the Continuing Learning Policy for the USEPA Acquisition Workforce Members</i> DAU's COR Training	<a href="http://epawww.epa.gov/oamintra">http://epawww.epa.gov/oamintra</a> <a href="https://acc.dau.mil/CommunityBrowser.aspx">https://acc.dau.mil/CommunityBrowser.aspx</a>
4.	Office of Government Ethics Form 450, Confidential Financial Disclosure Report	A list of Agency ethics officials is available on the Agency Intranet	<a href="http://intranet.epa.gov/ogc/ethics.htm">http://intranet.epa.gov/ogc/ethics.htm</a>
5.	Guidance on development of Acquisition Plans	FAR Subpart 7.1 – Acquisition Planning.	<a href="http://www.arnet.gov/far/">http://www.arnet.gov/far/</a>
6.	Guidance on developing SOWs and IGCEs: Statement of Work Review Checklist Sample Work Assignment Cost Estimating Worksheet (full costing Method) Planning Worksheet: Other Direct Costs	EPA Contracting Officer's Representative (COR) Training Text, Chapter 3, "Preparation of Work Assignments, Delivery and Task Orders" Contract Management Manual, Chapter 11.1, "Statements of Work"	<a href="http://epawww.epa.gov/oamintra/policy/cmm.pdf">http://epawww.epa.gov/oamintra/policy/cmm.pdf</a>
7.	Guidance on development of QASPs	Contract Management Manual, Chapter 11.1.5.7, "Developing a Performance-based Service Contract QASP"	<a href="http://epawww.epa.gov/oamintra">http://epawww.epa.gov/oamintra</a>
8.	Guidance on performing technical monitoring	Chapter 5, "Monitoring the Contractor's Performance" of the EPA Contracting Officer's Representative (COR) Training Text	<a href="http://epawww.epa.gov/oamintra/policy/cmm.pdf">http://epawww.epa.gov/oamintra/policy/cmm.pdf</a>
9.	Guidance on managing Contractor relationships	EPA Order 1900.1A, Use of Contractor Services to Avoid Improper Contractor Relationships.	<a href="http://epawww.epa.gov/oamintra/policy/eo19011a.pdf">http://epawww.epa.gov/oamintra/policy/eo19011a.pdf</a>
10.	Guidance on reviewing work plans and proposals to include: Checklist for Evaluating Contractor's Response/WorkPlan,	EPA Contracting Officer's Representative (COR) Training Text, Chapter 4, "Reviewing the Contractor's Work Plan"	<a href="http://epawww.epa.gov/oamintra/policy/cmm.pdf">http://epawww.epa.gov/oamintra/policy/cmm.pdf</a>

	Form/ Guidance	Source	Website
	Technical Approach and Staffing Plan Sample Contractor's Work Plan		
11.	Guidance on performing financial monitoring	Chapter 6, "Financial Monitoring (Invoice Review Process)" of EPA Contracting Officer's Representative (COR) Training Text.	<a href="http://epawww.epa.gov/oamintra/policy/cmm.pdf">http://epawww.epa.gov/oamintra/policy/cmm.pdf</a>
12.	Guidance on reviewing invoices	Invoice Review Guide (click on contract financial information) Chapter 11 of the Contracts Management Manual also covers procedures for invoice review.	<a href="http://intranet.epa.gov/oamintra">http://intranet.epa.gov/oamintra</a> by clicking on contract financial information.
13.	Guidance on Performance-based Services Acquisition	Seven Steps to Performance-Based Services Acquisition, an Interagency-Industry Partnership in Performance, 2006	<a href="http://www.acqnet.gov/comp/seven_steps/introduction.html">http://www.acqnet.gov/comp/seven_steps/introduction.html</a>
14.	Guidance on contract closeout	EPA Contracting Officer's Representative (COR) Training Text, Chapter 7 "Establishing Project Files"	<a href="http://epawww.epa.gov/oamintra/policy/cmm.pdf">http://epawww.epa.gov/oamintra/policy/cmm.pdf</a>
15.	Guidance on COR File management	EPA Contracting Officer's Representative (COR) Training Text, Chapter 7 "Establishing Project Files" Handling Sensitive Information of EPA, Series 202, Contract Management Records	<a href="http://epawww.epa.gov/oamintra/policy/cmm.pdf">http://epawww.epa.gov/oamintra/policy/cmm.pdf</a> <a href="http://www.epa.gov/records/policy/schedule/sched/202.htm">http://www.epa.gov/records/policy/schedule/sched/202.htm</a>

## Appendix D Interface Requirements

The purpose of this appendix is to provide general guidelines for collecting the appropriate information from contractors to ensure seamless integration of project data and promote efficient monitoring of the overall project. Frequently, data is needed by support contractors to enable the Project Manager to assess real-time status accurately against overall performance, schedule and cost objectives. In addition, the interface points among the different parties, both government and contractor, need to be fully delineated to ensure that each party understands its specific role and responsibility in data management and reporting and that the information can be efficiently captured utilizing the project's established management processes and tools. As a result it is essential that these data, reporting, and interface requirements be well defined early in the process in order to ensure that they are fully delineated in the awarded contract, WAs, DOs, and/or TOs. In addition, the frequency, format and mode of submission for the different reporting requirements also needs to be defined within the contract or WA, DO, or TO.

The following series of questions is provided to help determine the data, reporting and interface requirements that may be required for a specific project. Requirements may vary significantly depending on the scope, complexity, size, duration and of the project and type of contracts awarded. Overall the questions are designed to help refine what kind of information will be needed to ensure effective management of the project and the correlating responsibilities of the contractor.

- Will the contractor be required to provide regular status reports?
  - What level of detail is needed regarding technical, cost, and performance on the status reports?
  - How frequent should the reports and/or data be submitted?
  - Will the contractor be required to provide earned value management data?
  - What kind of format will the contractor need to provide status reports and/or data?
  - Will the contractor be required to feed reporting data into an automated process or tool?
  - If so, what tools (if any) will the contractor be required to interface with or provide data to support?
  - What is acceptable data submission formats?
  - What data elements must be provided?
  - What is the frequency for submission?
  - Is real-time data required?
- What data are needed for EPA to access contractor performance in the manner described by the QASP? How and when should this data be submitted?
- Will the contractor be required to identify and track risks and issues and provide updates to EPA? If so, in what format and at what frequency?
- What are the contractor's responsibilities related to development and updating of the master schedule?
  - Will the contractor be required to provide schedule information in a specific format, software?
  - Will the contractor be required to follow a defined WBS?